

May 26, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

**RE: Business Opportunity Rule, R511993**

To Whom It May Concern:

*May 1, 2006*

*'Lastly, the rule requires the disclosure of a minimum of 10 purchasers closest to you. While it is a good practice to provide references of satisfied customers, this is a burden for small businesses and, as a requirement, it is a violation of personal confidentiality particularly if you have to choose within your geographic area. Unfortunately, requiring the release of this information can threaten the business relationship of the references who may be involved in other companies or businesses. In addition, it subjects these references to cross-marketing by competitors. I am recommending that contact information for purchasers be available upon request, that their availability be published on company materials, and that due to Internet-marketing, they not be limited to geographic proximity.'*

The network marketing industry is one of the few remaining opportunities for people to earn additional income or to create a new career. Once scoffed at by investors, many network marketing companies are publicly traded on Wall Street including Herbalife, Nu Skin, Pre-Paid Legal Services, USANA and others. Network marketing is being used by blue-chip corporations including Citigroup, MCI and IBM. Top business management leaders and *New York Times* bestselling authors Robert Kiyosaki, Paul Zane Pilzer and Steven Covey have endorsed network marketing. Warren Buffet, the most successful and known businessman in modern history owns the network marketing company, Pampered Chef.

The industry is also growing in popularity and contributes to the U.S. economy. This growth should be encouraged. There are 13 million Americans involved in this network marketing industry today. Lastly, the network marketing industry contributes to our growing economy. Sales of products and services through network marketing are estimated at more than \$29 billion in 2003.

I have been involved in the network marketing industry for more than 2 years. I have met some of the finest people and have been introduced to some of the best products at a reasonable cost. For the first year, I was involved because I wanted the benefit of using the products. Also during this time, I was searching for a viable career option due to 10-years of downsizing in my federal government position and consistently being faced with top-level bureaucrats making erroneous decisions because they did not have to collect 'realistic' data and had the power! I have been working my network marketing business on a full-time basis and have replaced my government income (+\$65,000/annual) in one year. This home based business helped me significantly, and has allowed the financial freedom I needed to contribute to a global economy.

I understand and value the role of the FTC mission '***to stand up for America's free market process and for its consumers, who benefit from competitive markets in which truthful information flows.***' However, I believe this proposed new rule EXCEEDS what is necessary and needs significant modification. We live in a free market economy where people have the responsibility of making informed decisions based on the best information. A better approach would be to provide consumers with objective criteria when analyzing a business opportunity and let an informed market proceed. I am in support of the disclosures that should be made during the sales process ***without*** the requirement of a seven-day waiting period, only if modified as suggested.

Thank you, in advance, for reviewing and posting my comments.

Best Regards,

Rayna Peyron